

**BEFORE THE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

**In the Matter of the Accusation  
Against:**

**Jeffrey Michael Young, M.D.**

**Physician's and Surgeon's  
Certificate No. G 52682**

**Respondent**

**Case No. 800-2014-006524**

**DECISION**

**The attached Stipulated Surrender of License and Order is hereby adopted  
as the Decision and Order of the Medical Board of California, Department of  
Consumer Affairs, State of California.**

**This Decision shall become effective at 5:00 p.m. on August 21, 2017.**

**IT IS SO ORDERED August 14, 2017.**

**MEDICAL BOARD OF CALIFORNIA**

**By:**

  
**Kimberly Kirchmeyer  
Executive Director**

1 XAVIER BECERRA  
Attorney General of California  
2 JANE ZACK SIMON  
Supervising Deputy Attorney General  
3 GREG W. CHAMBERS  
Deputy Attorney General  
4 State Bar No. 237509  
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*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 800-2014-006524

11 **JEFFREY MICHAEL YOUNG, M.D.**

12 **285 Day Valley Road**  
13 **Aptos, CA 95003-9541**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

14 **Physician's and Surgeon's Certificate No. G**  
15 **52682**

16 Respondent.

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board  
22 of California (Board). She brought this action solely in her official capacity and is represented in  
23 this matter by Xavier Becerra, Attorney General of the State of California, by Greg W. Chambers,  
24 Deputy Attorney General.

25 2. Jeffrey Michael Young, M.D. (Respondent) is representing himself in this proceeding  
26 and has chosen not to exercise his right to be represented by counsel.  
27  
28

3. On or about June 25, 1984, the Board issued Physician's and Surgeon's Certificate No. G 52682 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2014-006524 and will expire on July 31, 2017, unless renewed.

## JURISDICTION

4. Accusation No. 800-2014-006524 was filed before the (Board), and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on June 29, 2017. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 800-2014-006524 is attached as Exhibit A and incorporated by reference.

## ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 800-2014-006524. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at his own expense; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

8. Respondent understands that the charges and allegations in Accusation No. 800-2014-006524, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and Surgeon's Certificate.

9. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual basis for the charges in the Accusation and that those charges constitute cause for discipline. Respondent hereby gives up his right to contest that cause for discipline exists based on those charges.

10. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Physician's and Surgeon's Certificate without further process.

## CONTINGENCY

11. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

12. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

## ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 52682, issued to Respondent Jeffrey Michael Young, M.D., is surrendered and accepted by the Medical Board of California.

1. 1.1. Respondent shall lose all rights and privileges as a physician in California as of the effective date of the Board's Decision and Order.

2. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.

3. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 800-2014-006524 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

4. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 800-2014-006524 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

#### ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: July 25, 2017

Jeffrey M. Young M.D.  
JEFFREY MICHAEL YOUNG, M.D.  
Respondent

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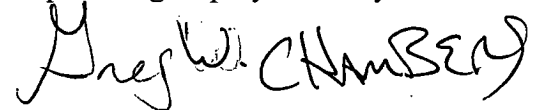
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
for consideration by the Medical Board of California of the Department of Consumer Affairs.

Dated: 7/31/2017

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
JANE ZACK SIMON  
Supervising Deputy Attorney General



GREG W. CHAMBERS  
Deputy Attorney General  
*Attorneys for Complainant*

SF2017203487  
Stipulation for surrender.rtf

**Exhibit A**

**Accusation No. 800-2014-006524**

1 XAVIER BECERRA  
Attorney General of California  
2 JANE ZACK SIMON  
Supervising Deputy Attorney General  
3 GREG W. CHAMBERS  
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12 **285 Day Valley Road**  
13 **Aptos, CA 95003-9541**

**A C C U S A T I O N**

14 **Physician's and Surgeon's Certificate**  
15 **No. G 52682,**

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Kimberly Kirchmeyer ("Complainant") brings this Accusation solely in her official  
20 capacity as the Executive Director of the Medical Board of California, Department of Consumer  
21 Affairs (Board).

22 2. On June 25, 1984, the Medical Board issued Physician's and Surgeon's Certificate  
23 Number G 52682 to Jeffrey Michael Young, M.D. ("Respondent"). The Physician's and  
24 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought  
25 herein and will expire on July 31, 2017, unless renewed.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board, under the authority of the following  
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.



4. Section 2004 of the Code states, in pertinent part:

**“The board shall have the responsibility for the following:**

“(a) The enforcement of the disciplinary and criminal provisions of the Medical Practice

Act.

“(b) The administration and hearing of disciplinary actions.

“(c) Carrying out disciplinary actions appropriate to findings made by a panel or an administrative law judge.

“(d) Suspending, revoking, or otherwise limiting certificates after the conclusion of disciplinary actions.

“(e) Reviewing the quality of medical practice carried out by physician and surgeon certificate holders under the jurisdiction of the board.

“ ”  
□ □ □ □

5. Section 2227 of the Code provides that a licensee who is found guilty under the Medical Practice Act may have his or her license revoked, suspended for a period not to exceed one year, placed on probation and required to pay the costs of probation monitoring, or such other action taken in relation to discipline as the Board deems proper.

6. Section 2234 of the Code, states, in pertinent part:

“The board shall take action against any licensee who is charged with unprofessional conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not limited to, the following:

“(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the violation of, or conspiring to violate any provision of this chapter.

“(b) Gross negligence.

“ ”  
• • • •

## FACTS

7. At all times relevant to this matter, Respondent was licensed and practicing medicine at the Santa Cruz County Health Services.

**PATIENT E.R.<sup>1</sup>**

8. Patient E.R., then 32 years old, began seeing Respondent as a patient on May 3, 2012 shortly after being released from prison. E.R. sought treatment for his opioid addiction. Respondent prescribed buprenorphine<sup>2</sup> for E.R. and saw him for regular follow-up visits over the next year and a half.

9. In late October 2013, Respondent went out to lunch with E.R.

10. Respondent spent Thanksgiving 2013 with E.R. and his mother at the mother's invitation.

11. In December 2013, Respondent notified his supervisor at the Santa Cruz County Health Services that he was starting a friendship with E.R. and requested that his care be transferred to another physician at the clinic. The only other physician who was certified to prescribe buprenorphine worked part time and did not have an available appointment until February 2014.

12. Respondent saw E.R. for an appointment on December 30, 2013 and prescribed buprenorphine for E.R. on January 17, 2014.

13. Another physician at Santa Cruz County Health Services assumed E.R.'s care in February 2014.

**CAUSE FOR DISCIPLINE**

**(Gross Negligence)**

14. Respondent Jeffrey Michael Young, M.D. is subject to disciplinary action under section 2234, subdivisions (a) (violating Medical Practice Act) and (b) (gross negligence), of the Code in that Respondent maintained a nonmedical relationship with Patient E.R. while continuing to provide medical care to him.

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<sup>1</sup> The patient is designated in this document as Patient E.R. to protect his privacy. Respondent knows the name of the patient and can confirm his identity through discovery.


<sup>2</sup> Buprenorphine is a narcotic that can be used for the relief of moderate to severe pain and to help people reduce or quit their use of opioid medications. It is a dangerous drug under Business and Professions Code section 4022 and a Schedule III controlled substance.

**PRAYER**

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Medical Board of California issue a decision:

1. Revoking or suspending Physician's and Surgeon's Certificate Number G 52682, issued to Jeffrey Michael Young, M.D.;
2. Revoking, suspending or denying approval of Jeffrey Michael Young, M.D.'s authority to supervise physician assistants and advanced practice nurses;
3. Ordering Jeffrey Michael Young, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: June 29, 2017

  
KIMBERLY KIRCHMEYER  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California  
Complainant

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accusation - mbc.rtf